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November 26, 2019

By ECF

Honorable Kenneth M. Karas United States District Court, Southern District of New York 300 Quarropas Street White Plains, New York 10601

Re:

Board of Managers of Trump Tower at City Center Condominium v. Palazzolo,

No. 7:16-cv-09188-KMK

Dear Judge Karas:

We represent defendants Stephen Tobia, Stephen Reitano, Lorraine DiStefano, Gina Thomas, Joseph Santangelo, Premium Parking LLC, Premium Staffing LLC, RLA Holdings LLC and First Resource Funding LLC. Per the Court's instructions at the October 25 case management conference, I write to propose the following schedule for defendants to move for summary judgment on the issues discussed at the conference:

Moving papers:

January 15, 2020

Opposition papers:

March 2, 2020

Reply papers:

March 23, 2020

All parties have agreed to this proposed schedule and respectfully request that the Court adopt it.

Respectfully submitted,

Erin Durba

Cc: Counsel of record (via ECF)